

CLEARY | GIACOBBE | ALFIERI | JACOBS LLC

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Reply to: Oakland Office

August 9, 2024

**VIA ELECTRONIC MAIL**

Honorable Jessica S. Allen, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Maria Saravia Alarcon v. Giannella's Modern Bakery, et al.**  
**Civil Action No. 2:23-cv-00447(EP)(JSA)**

Dear Judge Allen:

As you are aware, this firm represents Defendants, Giannella's Modern Bakery and John Imparato, in the above-referenced matter. Please accept this correspondence as the parties' joint proposal for remaining fact discovery.

As the Court is aware, certain potential class members have filed Notices to join the within lawsuit that would include: Maria Saravia Alarcon, Dilsy Griselda Salvatierra Perez; Oralia Pachecho; Karla Damaris Vidal; Santos Hugo Najera Lopez and Ana Pachecho. We are seeking a period of time to exchange mutual paper discovery for these individuals by September 13, 2024. Thereafter, the defense requests an additional timeframe to conduct their depositions by October 25, 2024.

We thank the Court for its consideration in this matter.

Respectfully submitted,  
*/s/ John M. Tuntevski*  
John M. Tuntevski  
For the Firm

cc: Galen Baynes, Esq.

\*The proposed schedule is granted. Further, the parties shall submit a joint status letter on or before 10/16/24, addressing the completion of discovery. A Telephone Status Conference is scheduled for 10/22/24 at 3:00 p.m. The parties are instructed to dial 1-888-684-8852 and enter Access Code 9972150# at the time of the Conference. SO ORDERED.

s/Jessica S. Allen  
United States Magistrate Judge

Dated: August 13, 2024

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